

# EXHIBIT 'A'

Donald G. Targan, Esquire  
ID No. 207501962  
DONALD G. TARGAN & ASSOCIATES  
30 South New York Avenue  
First Floor  
Atlantic City, New Jersey 08401  
(609) 348-1106

---

VANDA E. CAREY and  
THOMAS P. CAREY,

Plaintiffs

v.

CAESARS ATLANTIC CITY  
CORPORATON,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
ATLANTIC COUNTY  
DOCKET NO. ATL-L-

CIVIL ACTION

COMPLAINT

---

The Plaintiffs, Vanda E. Carey and Thomas P. Carey, residing at 563 Bethany Lane in the Township of Brick, County of Ocean and State of New Jersey, complaining against the Defendant, Caesars Atlantic City Corporation, say:

**FIRST COUNT**

1. On or about April 28, 2019, and for a substantial period of time thereto, the Defendant, Caesars Atlantic City, owned, operated, leased, maintained and controlled the aforesaid premises known as the Caesars Atlantic City including the casino floor.

2. On or about April 28, 2019, the Plaintiff, Vanda E. Carey, was a business invitee at

the premises known as the Caesars Atlantic City located at Arkansas and Pacific Avenue in the City of Atlantic City, County of Atlantic and State of New Jersey.

3. On or about April 28, 2019, the Plaintiff, Vanda E. Carey, while a business invitee in the casino area of the aforesaid premises, was attacked and seriously injured by a dangerous criminal who was in the vicinity of the casino floor in the area where the slot machines are located.

4. At the time that the Plaintiff was attacked by the dangerous criminal, the Caesars Casino Atlantic City and their staff negligently failed to provide adequate security on the casino floor and failed to provide a staff of security personnel to protect guests from attacks by any criminals who are on the casino floor.

5. As a result of the foresaid negligence of the management and supervisors and inadequate security system to protect guests on the casino floor, the Plaintiff, Vanda E. Carey, was attacked and sustained personal injuries, damages and losses.

**WHEREFORE**, Plaintiff, Vanda E., Carey, demands judgment against Defendant, Caesars Atlantic City, for damages, interest and costs of suit.

### **SECOND COUNT**

1. The Plaintiffs, Vanda E. Carey and Thomas P. Carey, repeat the allegations of the First Count as if set forth in its entirety.

2. The Plaintiff, Thomas P. Carey was at all times mentioned herein and still is the husband of the Plaintiff, Vanda E. Carey.

3. As a result of the aforesaid negligence of the Defendant, Caesars Atlantic City, the Plaintiff, Thomas P. Carey, was deprived of the services, assistance, companionship and consortium of his wife.

**WHEREFORE**, Plaintiff, Thomas P. Carey, demand judgment against Defendant, Caesars Atlantic City, for damages, interest and costs of suit.

**JURY DEMAND**

The Plaintiffs hereby request a trial by jury as to all issues referred to in the Complaint.

**DEMAND FOR ANSWERS TO INTERROGATORIES**

The plaintiffs hereby demand that the defendants answer Form C Interrogatories within the time prescribed by the Rules of Court.

**CERTIFICATION**

I certify that this matter is not the subject of any pending lawsuit or arbitration.


I further certify that no other parties should be joined in this action.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to R. 4:25-4, Donald G. Targan, Esquire is hereby designated as trial counsel in the above captioned litigation on behalf of plaintiff.

**DONALD G. TARAGN & ASSOCIATES**  
Attorneys for Plaintiffs

By:

  
Donald G. Targan

Dated: 10/8/20